

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARK HOFFMAN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

**BCI ACRYLIC, LLC
D/B/A BATH PLANET**

and

**NORTHWEST BATH SPECIALISTS, LLC
D/B/A BATH PLANET OF SEATTLE**

Defendants.

Case No. 25-cv-6017

Judge Lindsay C. Jenkins

DECLARATION OF CHARLES HARTSHORN

I, Charles Hartshorn, pursuant to 28 USC § 1746 do hereby declare as follows:

1. My name is Charles Hartshorn, and I am over the age of eighteen (18) years and duly qualified to execute this declaration.
2. I reside in Greenacres, Washington.
3. I am the owner, sole member, and governor of Northwest Bath Specialists, LLC ("Northwest Bath").
4. I made this Declaration based upon my personal knowledge of the matters contained herein and my review of Northwest Bath's business records kept in the normal course of its business.
5. Northwest Bath is a Washington limited liability company with its principal place of business in Spokane Valley, Washington.

6. Northwest Bath sells and installs products for bathroom remodels and bathroom renovations.

7. Northwest Bath has 3 wholly owned locations.

8. Bath Planet of Seattle is located in Kent, WA.

9. Bath Planet of Eastern Washington is located in Spokane Valley, WA

10. Bath Planet Tri Cities is located in Kennewick, WA.

11. Northwest Bath does not own, lease or rent any other properties beyond the above mentioned.

12. Northwest Bath utilizes the “Bath Planet” trademark pursuant to the terms of an agreement with Bath Planet, LLC making Northwest Bath an authorized seller and installer of products manufactured by Bath Planet.

13. In addition to products manufactured by Bath Planet, Northwest Bath also sells and installs products manufactured by other brands such as Moen, Delta, SanSpa, Americh, Arizona Shower Door, Zoe, and National Acrylic.

14. Northwest Bath only sells and installs products in two states; Washington and Idaho.

15. Over the past five years, approximately 92% of Bath Planet’s sales and installations were with customers in the State of Washington and approximately 8% in the State of Idaho. It did not sell products in or install products in any other state.

16. All of Northwest Bath’s employees work at facilities located in Washington and work exclusively in Washington with the exception of sales and installations in Idaho, a bordering state.

17. Northwest Bath is only licensed to do business in Washington and Idaho. Northwest

Bath's contractors have active contractor licenses in Washington and Idaho, which is required to install its products in only these two states as well.

18. All of Northwest Bath's marketing programs are operated by employees out of its office in Spokane Valley, WA.

19. Northwest Bath does not hold any business licenses in Illinois.

20. Northwest Bath does not own, lease, or rent any property in Illinois.

21. Northwest Bath does not have a bank account in Illinois.

22. Northwest Bath has never sold or installed any products in the state of Illinois.

23. Northwest Bath does not conduct any marketing, events, or mailers with the aim of selling products in Illinois, or provide demonstrations in Illinois.

24. Northwest Bath has not made any references to Chicago, or Illinois in its marketing, or targeted by itself or through an agent any potential clients in Illinois.

25. Northwest Bath has not made any alterations or changes to its technology based on specific Illinois needs or objectives.

26. Northwest Bath does not make any reference to any ability to sell or install its products outside of Washington and Idaho.

27. Northwest Bath only seeks out customers where they are licensed to do business in the states of Washington and Idaho.

28. No employee of Northwest Bath has traveled for business purposes to Illinois in the last (5) years.

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.**

Executed on August 1, 2025 in Spokane Valley, Washington.



Charles Hartshorn